



THOMAS C. JORLING
COMMISSIONER

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
ALBANY, NEW YORK 12233-1010

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Dear Ms. Searcy:

This letter provides comments on the Federal Communications

A major increase in the number of sites presents two major problems:

1. To develop or lease the additional sites required would require funding on the order of 6 million dollars.
2. In remote areas of the Adirondack and Catskill Parks, there exist land use restrictions which severely limit or preclude the addition of radio towers to mountain tops presently undeveloped. In remote areas we may simply not be able to add sites whether or not we can afford them.

In remote areas, our operations include searches for lost persons, detection and suppression of forest fires and, enforcement of conservation laws. Without a two-way radio system that provides good coverage in mountainous areas, we will not be able to safely and effectively meet our responsibilities.

CANADIAN INTERFERENCE

The majority of interference to our radio system comes from Canada. If the United States goes to narrow band technology and the Canadian two-way radio systems continue to operate at present bandwidth and power levels, the interference problems from Canadian operations will be greatly magnified. In addition, there will be very little, if any, increase in available channels north of Line A.

MOBILE RELAYS

Section 88.473 of the proposed rules appears to prohibit mobile relay operation in the 150-174MHz band. Our radio systems are completely dependent on mobile relays. Our Law Enforcement personnel are not under the direct control and supervision of a dispatcher, but rather are supervised by Lieutenants who are also on patrol in the field. For this reason we require car-to-car coverage over areas up to several counties in size. To shift to a remote base type of operation would require a total change in our way of supervising staff, plus it would require a complex network of microwave, control links, and/or land line that is not now required.

INTEROPERABILITY

This agency's field personnel depend upon radio communications with other agencies such as state, county and local police, fire departments and federal agencies during the normal conduct of business. During migration to the new standards, this interoperability will be totally lost. After progression to the new technology, it is unclear that sufficient

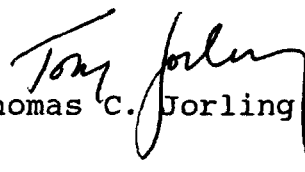
standards have been defined to allow the interoperability that we require.

OVERALL COST

The proposed rules will require the complete replacement of every piece of radio equipment that we own and an increase in the quantity of fixed radio equipment that we own. Since radio products have not been developed to meet the new technology requirements, the price range of this equipment is also not defined. Despite this uncertainty, it is estimated that the cost of this program will be 15 to 20 million dollars which represents a major financial commitment for our agency.

These comments reflect the responsibilities and methods of operation of our agency and are presented to enlighten the Commission on the severe impact this proceeding would have on this agency.

Sincerely,


Thomas C. Jorling

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
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